

**GREENBERG TRAURIG LLP**

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*Attorneys for Joseph P. LaSala and Fred S. Zeidman,  
as Co-Trustees of the AremisSoft Liquidating Trust, Plaintiffs*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JOSEPH P. LASALA and  
FRED S. ZEIDMAN, as CO-TRUSTEES  
of the AREMISSOFT CORPORATION  
LIQUIDATING TRUST,

Plaintiffs,

v.

MARFIN POPULAR BANK PUBLIC  
COMPANY, LTD.,

Defendants.

Civil Action No.  
09-CV-00968 (JAP)

**NOTICE OF MOTION FOR A STAY  
OF FURTHER CONSIDERATION OF  
DEFENDANT'S MOTION TO  
DISMISS BASED ON POSSIBLE  
SPOLIATION OF DOCUMENTS AND  
FOR AN ORDER REQUIRING  
DEFENDANT TO PRODUCE  
DOCUMENTS HELD BY  
DEFENDANT'S COUNSEL  
PURSUANT TO THIS COURT'S  
ORDER OF AUGUST 7, 2009 TO  
ALLOW PLAINTIFFS TO  
INVESTIGATE POSSIBLE  
SPOLIATION AND TO SUPPLEMENT  
THEIR OPPOSITION TO  
DEFENDANT'S MOTION TO  
DISMISS**

**PLEASE TAKE NOTICE** that on Tuesday, January 19, 2010, at 11:00 a.m., or as soon thereafter as counsel may be heard, Joseph P. LaSala and Fred S. Zeidman, as co-Trustees of the AremisSoft Corporation Liquidating Trust (the "Trust"), by and through the undersigned counsel, Greenberg Traurig, LLP, shall move before the Honorable Joel A. Pisano, United States District Court Judge, United States District Court for the District

of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Room 2020, Trenton, New Jersey, for a Stay of Further Consideration of Defendant's Motion to Dismiss the Complaint Based on Possible Spoliation of Documents and for an Order requiring Defendant to Produce Documents held by Defendant's Counsel Pursuant to this Court's Order of August 7, 2009 to allow Plaintiffs to Investigate Possible Spoliation and to Supplement their Opposition to Defendant's Motion to Dismiss the Complaint., and for such other and further relief as the Court deems to be just.

**PLEASE TAKE FURTHER NOTICE** that in support of its motion, the movants will rely upon the Declaration of Hal M. Hirsch and the respective exhibits attached thereto, and the accompanying Memorandum of Law in support of the motion, submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs hereby request oral argument.

Dated: December 15, 2009

**GREENBERG TRAURIG, LLP**

By: /s/ Hal M. Hirsch  
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